

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
DIANE RENEE ERDMANN,
Defendant.

Case No. CR18-92RAJ

**Unopposed Motion to Withdraw
as Counsel for Diane Erdmann**

Noted: May 10, 2022

MOTION

Russell M. Aoki and Isham M. Reavis of Aoki Law, PLLC request this Court for an order allowing their withdrawal from further representation of Defendant Diane Erdman. If granted, and should Ms. Erdman reappear in this jurisdiction, co-counsel Steven W. Fogg and his associate counsel, Benjamin C. Byers of Corr Cronin LLP will remain as her counsel of record. The government and Messrs. Fogg and Byers have been consulted, and none oppose this motion.

BASIS FOR MOTION

On May 5, 2020, this Court appointed Russell M. Aoki and Steven W. Fogg to represent Ms. Erdmann. The Court later appointed their respective associate counsel, Mr. Reavis and Mr. Byers. The matter was tried in July of 2021. Sentencing, after several continuances, was scheduled for April 29, 2022. Sentencing materials were prepared and submitted on behalf of Ms. Erdmann. As

1 the Court is aware, Ms. Erdmann, and her co-defendant, Bernard Ross Hansen
2 failed to appear.

3 It seems unlikely four defense counsel will be needed to further represent
4 Ms. Erdmann should she return to this jurisdiction. Messrs. Fogg and Byers agree
5 to continue as counsel of record for Ms. Erdmann. In the off chance additional
6 resources are necessary should she return the undersigned are available to be
7 reappointed.

8 **CONCLUSION**

9 Russell M. Aoki and Isham M. Reavis of Aoki Law, PLLC respectfully request
10 this Court allow their withdrawal from further representation of Ms. Erdmann.

11 Dated this 10th day of May 2022.

12 AOKI LAW PLLC

13 s/ Isham M. Reavis

14 Isham M. Reavis, WSBA No. 45281
15 1200 5th Avenue, Suite 750
16 Seattle, WA 98101
17 T: 206 624-1900
F: 206 442-4396
isham@aokilaw.com

18 *Attorney for Diane Erdmann*

AOKI LAW PLLC

13 s/ Russell M. Aoki

14 Russell M. Aoki, WSBA #15717
15 1200 5th Ave., Suite 750
16 Seattle, WA 98101
17 T: 206.624.1900
F: 206.442.4396
russ@aokilaw.com

18 *Attorney for Diane Erdmann*